

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

RAMAS CAPITAL MANAGEMENT, LLC and
GANESH H. BETANABHATLA,

Defendants.

CASE NO. 4:22-cv-2979

UNOPPOSED MOTION TO WITHDRAW AS COUNSEL

Pursuant to Local Rule 83.2, Lipman Law PLLC (“Lipman Law”), hereby files this Unopposed Motion to Withdraw as Counsel for Ramas Capital Management, LLC and Ganesh H. Betanabhatla, (“Defendants”) and would respectfully show the Court as follows:

1. As required by Local Rule 83.2, there is good cause for this Court to grant the motion to withdraw. Among other things, a conflict has arisen that prevents Lipman Law from continuing representation. Defendants remain represented by counsel David Isaak and Hector Chavez, Smyser Kaplan & Veselka, L.L.P., who will continue on with this matter.
2. Lipman Law has informed the parties of its intention to withdraw with remaining counsel continuing in its stead. This withdrawal has no impact on the written settlement offer that Defendant Ganesh H. Betanabhatla recently submitted to the Commission, and there is no opposition to the relief sought. As Defendants will continue to be represented by counsel, this withdrawal will not cause delay.

For the foregoing reasons, Lipman Law respectfully requests that the Court grant its motion to withdraw, with all other counsel of record remaining unchanged.

Respectfully submitted,

LIPMAN LAW PLLC

/s/ Alex Lipman

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**ATTORNEYS FOR DEFENDANTS
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CERTIFICATE OF CONFERENCE

I hereby certify that on May 23, 2023, I had a telephonic conference with Plaintiff's counsel (Keefe Bernstein) and Defendant's remaining co-counsel (Hector Chavez) regarding the relief requested herein. Plaintiff's counsel stated that the SEC would not oppose the requested relief.

/s/ Alex Lipman

Alex Lipman

CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2023 the above and foregoing was served on all counsel of record via the Court's ECF/CM system.

/s/ Hector R. Chavez

Hector R. Chavez